

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JOSEPH L. CARPENTER,)	Case No.: 1:15-CV-212-AJT/JFA
)	
Plaintiff,)	
v.)	
)	
<myschool.com>,)	
)	
Defendant.)	
)	
)	
)	

**MEMORANDUM IN SUPPORT OF CONSENT MOTION FOR WITHDRAWAL OF
THE APPEARANCE OF DUNLAP BENNETT & LUDWIG, PLLC
AS COUNSEL FOR JOSEPH L. CARPENTER**

David Ludwig, Christina M. Heischmidt, Eric Olavson, and the law firm of Dunlap Bennett & Ludwig, PLLC (hereinafter, collectively, the “Firm”), respectfully request leave for the Firm and its attorneys to withdraw as counsel for Plaintiff Joseph L. Carpenter (the “Client”) in the above-styled action for the following reasons:

1. Pursuant to Rule 1.16(b) of the Rules of Professional Conduct, the Firm has sufficient grounds to withdraw from this representation.
2. Pursuant to Rule 1.6(a) and 1.16(d) of the Rules of Professional Conduct, the Firm is unable to set forth the detailed factual basis for the requested withdrawal in this filing.
3. The Client has been advised of the Firm’s intent to withdraw and consents to said withdrawal.

4. Plaintiff will not be seeking any substitution of counsel in this matter. Plaintiff intends to proceed *pro se* in this matter. Plaintiff will only be seeking a modest continuance of the trial date to accommodate his health issues.

5. To avoid potential prejudice to Plaintiff and to accommodate his health concerns, Plaintiff hereby requests a two week continuance of the trial date in this matter.

6. Also to avoid potential prejudice to Plaintiff and enable him to litigate this case *pro se*, Plaintiff further hereby requests access to information designated as “Highly Confidential – Outside Counsel Only” under the Protective Order in this case.

7. Defendant will not be filing an opposition to the motion to withdraw. However, Defendant opposes Plaintiff’s request for access to “Highly Confidential – Outside Counsel Only” materials and believes that a status conference is appropriate before Plaintiff is given access to these documents.

8. The Firm waives its right to a hearing on this matter.

WHEREFORE, the Firm respectfully requests that the Court enter an Order granting Dunlap Bennett & Ludwig, PLLC, and all attorneys associated with Dunlap Bennett & Ludwig, PLLC leave to withdraw as counsel for Plaintiff Joseph L. Carpenter in this matter.

By: /s/ David Ludwig
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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2015, the foregoing Memorandum in Support was filed and served electronically by the Court's CM/ECF system upon all registered users:

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I hereby certify that I will mail the document by U.S. mail to the following non-filing users:

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